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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHELLE C. ZEITER, individually, and as
Special Administrator for ESTATE OF
MICHAEL BUCHNA; JENNIFER C. BEAM,
individually, and as Special Administrator for
ESTATE OF MICHAEL S. BUCHNA,

Plaintiffs,

v.

WALMART INC., a foreign corporation d/b/a
WALMART SUPERCENTER #3351; and
WAL-MART STORES, INC., a foreign
corporation; and DOES I through X; inclusive;
and ROE CORPORATIONS I through V,
inclusive,

Defendants.

CASE NO.: 2:21-cv-00061-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE AND
SERVE PLAINTIFFS' REPLY TO
DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED by and between Plaintiffs MICHELLE C. ZEITER,
Individually and as Special Administrator for ESTATE OF MICHAEL BUCHNA and
JENNIFER C. BEAM, Individually and as Special Administrator for ESTATE OF MICHAEL
S. BUCHNA (collectively "Plaintiffs"), by and through their attorneys of record SIMON LAW
and BROCK H. OHLSON PLLC, and Defendants WALMART, INC. and WAL-MART

1 STORES, INC. (collectively “Defendants”), by and through their attorneys of record, HALL &
2 EVANS, LLC, (foregoing parties are collectively referred to hereinbelow as “Parties”) hereby
3 submit their Stipulation and Order to Extend Deadline to File and Serve Plaintiffs’ Reply to
4 Defendants’ Response [ECF No. 162], filed August 20, 2024, to Plaintiffs’ Motion for
5 Summary Judgment [ECF No. 159], filed July 19, 2024, pursuant to LR IA 6-1. This is the
6 second stipulation for extension of deadlines to Plaintiffs’ Motion for Summary Judgment.

7 REASONS FOR REQUESTING AN EXTENSION OF DEADLINES

8 The Parties aver that good cause exists to extend the existing deadline for Plaintiffs’
9 Reply by 10 days from the date of the September 10, 2024 request, which would be Friday,
10 September 20, 2024. Plaintiffs’ counsel has encountered several conflicts due to other
11 scheduling matters, including significant discovery for a complex federal insurance bad-faith
12 litigation case that involved party depositions; expert depositions; percipient witness
13 depositions; and significant motion work in the past 60 days.

14 Thus, the parties have agreed to extend the respective response Reply deadline ten days
15 as set forth below:

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1 - Plaintiffs' deadline to file and serve a reply:

2 • Existing deadline: Tuesday, September 10, 2024

3 • **Proposed deadline: Friday, September 20, 2024**

4
5 Dated this 10 day of September, 2024.

Dated this 10 day of September, 2024.

6 **SIMON LAW**

HALL & EVANS, LLC

7 */s/ Daniel S. Simon*

/s/ Kurt R. Bonds

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Attorneys for Defendants

12 *Attorneys for Plaintiffs*

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16 **IT IS SO ORDERED.**

17
18
19 
UNITED STATES DISTRICT JUDGE

DATED: September 11, 2024